

EXHIBIT A
(PROPOSED ORDER)

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

In re:

BLOCKFI INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 22-19361 (MBK)
(Jointly Administered under a Confirmed Plan²)

Hearing Date: November 7, 2024 @ 11:30 a.m.

**ORDER GRANTING WIND-DOWN DEBTORS' MOTION FOR ENTRY
OF AN ORDER TO SHOW CAUSE WHY GEORGE GERRO SHOULD
NOT BE FOUND IN CONTEMPT AND FOR SANCTIONS AND IN THE
ALTERNATIVE, MOTION TO ENFORCE THE CONFIRMATION ORDER**

The relief set forth on the following pages, numbered one (1) and two (2), is hereby
ORDERED.

¹ The Wind-Down Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC. (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Wind-Down Debtors' service address is c/o M3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

² On October 3, 2023, the Court entered an order confirming the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Additional Technical Modifications) (the "Plan") [Docket No. 1609].

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Upon consideration of the *Wind-Down Debtors' Motion for Entry of an Order to Show Cause Why George Gerro Should Not Be Found in Contempt and for Sanctions and in the Alternative, Motion to Enforce the Confirmation Order*¹; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. § 157(b)(2) and Standing Order 12-1 (Simandle, C.J.), *Standing Order of Reference to the Bankruptcy Court Under Title 11*, dated September 18, 2012; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

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Caption of Order: ORDER EXTENDING THE WIND-DOWN DEBTORS' TIME TO FILE AND SERVE OBJECTIONS TO CLAIMS

this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided; and it appearing that no other or further notice need be provided; and it appearing that no other or further notice of the Motion need be provided; and all responses, if any, to the Motion having been withdrawn, resolved, or overruled; and the Court having found and determined that the relief sought in the Motion is in the best interests of the Wind-Down Debtors, and all parties-in-interest; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor, and the Court reviewed the Motion and determined that the legal and factual bases set forth in support of the Motion establish just cause for the relief granted herein.

The Court finds that George J. Gerro is in contempt of the Court's *Revised Findings of Fact, Conclusions of Law, and Order (I) Approving the Disclosure Statement Relating to the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code on a Final Basis and (II) Confirming the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Additional Technical Modifications)* [Docket No. 1660] (the "Confirmation Order") confirming the Plan, which went effective on October 24, 2023 (the "Effective Date") [Docket No. 1788].

IT IS HEREBY ORDERED THAT:

1. George J. Gerro shall dismiss Case No. 20BBCV00308 and Case No. 20STCV31493 pending in the Superior Court of the State of California, County of Los Angeles, Burbank Courthouse (the "Prepetition Litigation") in their entirety with prejudice promptly upon entry of this Order.

2. A copy of this Order shall be served on George J. Gerro at his last known address

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(if available) within 24 hours of the entry of this Order.

3. A copy of this Order shall also be filed in the Prepetition Litigation, to provide notice to the presiding judge.

4. The Plan and Confirmation Order enjoin Gerro from filing any additional lawsuits in any jurisdiction against the Wind-Down Debtors or other Released Parties.

5. All time periods and deadlines set forth herein shall be calculated pursuant to FED. R. BANKR. P. 9006.

5. This Order is immediately effective upon its entry.

6. If the Prepetition Litigation is not fully dismissed with prejudice within ten (10) days following entry of this Order, George J. Gerro may be liable for the Wind-Down Debtors' reasonable costs and attorneys' fees associated with enforcing their rights, including the prosecution of this Motion. The Wind-Down Debtors shall report such violation of this Order to the Court and seek a hearing to consider the appropriate amount of such reasonable costs and attorneys' fees.

7. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the interpretation or enforcement of this Order.